



Gmail

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Kintetsu World Express v. Dialectic Distribution | 1:21-cv-09579-JHR | KLSE File: 6405

Charles Schmidt <cschmidt@klselaw.com>

Fri, Feb 23, 2024 at 3:23 PM

To: "David Rubenstein Esq." <drubenstein@rubensteinbusinesslaw.com>

Dear David,

Taking your last question first, at my request KWE USA asked its European sister companies to search for relevant email. I have reviewed it and it is being processed for production. There is a substantial amount of it and some is in German and some is in Dutch as well. I was told there was some kind of software glitch with the processing that has delayed production, and have asked for an update on the processing status. I will advise you as soon as I have a response.

On the question of depositions of KWE personnel, you have not served any notices. I'm not one to stand on ceremony, but tell me what witnesses you wish to depose and in what order (if you have a preference). I will then contact them and find out their availabilities.

I have previously served you notices for the Dialectic witnesses KWE wishes to depose. I have been waiting for you to identify the 30(b)(6) witness(es) who will appear. I would prefer to depose the individuals noticed in the order originally scheduled. Can you advise their availability; I am generally available in March.

I will prepare a further request for an extension of discovery time patterned largely after the last one, updating what has happened in the interim, to

which I assume you will consent as before.

[Quoted text hidden]